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September 26, 2017

Via ECF

Honorable Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Galanis, et al.*, S1 16-cr-371 (RA)

Dear Judge Abrams:

The undersigned represents Michelle Morton in the above-captioned matter. We write on behalf of Ms. Morton in response to the government's opposition to the defendants' joint request for an adjournment of the October 2, 2017 deadline to file pre-trial motions, and to join in the letters submitted by co-defendants Devon Archer, Bevan Cooney, and Gary Hirst, filed earlier today.

Like counsel for Ms. Morton's co-defendants, we have diligently reviewed the voluminous discovery produced in this case as we have received it on a rolling basis. And we agree with co-defense counsel that any and all discovery is relevant to our potential motions, most notably a severance motion in light of Ms. Morton's unique position as the only individual that the government charged from the relevant Investment Advisers in this case.

The government represented that defendants have had the discovery for more than one year. This is not true in several respects. First, present counsel for Ms. Morton first joined the case in March 2017, giving us only seven months with access to the discovery. Had the government not produced more documents we would have been well-suited to file motions even under that compressed timeline. In addition, as the Court surely recalls, the government represented during the March 3, 2017 status conference that it had completed its discovery productions. Nevertheless, the government subsequently served a search warrant for certain e-

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mail accounts, and obtained the server from one of the two relevant Investment Advisers. The government has produced documents from both sources throughout this past summer, and we understand that it intends to produce additional documents still. These documents—particularly those from the Investment Adviser—are highly relevant to Ms. Morton’s potential motions and her overall defense.

Accordingly, and for the reasons stated in the letters submitted by counsel for Ms. Morton’s co-defendants, we respectfully request that the Court adjourn the October 2, 2017 motions deadline.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'GM', with a large, sweeping loop at the end.

Greg Morvillo

cc: All counsel of record (via ECF)